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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 KRYSTA TREMKO,

11 Plaintiff,

12 v.

13 CAPITAL BANK; CHEX SYSTEMS, INC.;
14 CLARITY SERVICES, INC.; DISCOVER
15 BANK; DISH NETWORK L.L.C.; EQUIFAX
INFORMATION SERVICES, LLC;
16 EXPERIAN INFORMATION SOLUTIONS,
17 INC.; FACTOR TRUST, INC.; KOHL'S /
CAPONE; MASON COMPANIES INC.;
18 SYNCHRONY BANK; and TRANS UNION
LLC,

19 Defendants.
20

Case No.: 2:24-cv-00307-APG-MDC

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER**

(First Request)

21 Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1 and LR 26-3, Plaintiff Krysta Tremko and
22 Defendant Synchrony Bank, by and through their undersigned counsel, respectfully stipulate to and
23 request a fourteen (14) day enlargement of time to file the Joint Pretrial Order. In support thereof,
24 the parties provide the following:

25 1. The Joint Pretrial Order is currently due to the Court on November 8, 2024 [ECF
26 No. 77].

27 2. The parties acknowledge that this stipulation is being filed within 21 days of the
28 applicable deadline and thus, requires a showing of good cause. LR 26-3.

3. Counsel for the parties have been in good-faith settlement discussions to try to resolve the case and obviate the need for further litigation. Therefore, counsel for the parties have conferred and agreed to jointly seek a modest extension of time to allow additional time for continued settlement discussions.

4. This stipulation is made in good faith and not for purposes of undue delay. This is the parties' first extension request, and no party will be prejudiced by the relief sought.

5. The parties therefore respectfully request this Court extend the time to file the Joint Pretrial Order to, and including, November 22, 2024.

IT IS SO STIPULATED.

DATED this 5th day of November, 2024.

/s/ Brittni A. Tanenbaum

J Christopher Jorgensen, Esq.

Brittni A. Tanenbaum, Esq.

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/s/ Miles N. Clark

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Attorneys for Defendant Synchrony Bank

Attorneys for Plaintiff Krysta Tremko

IT IS SO ORDERED:


 Hon. Maximiliano D. Couvillier III
 UNITED STATES MAGISTRATE JUDGE
 DATED: 11/7/2024

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 2024, I caused the foregoing
**STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER** to be electronically filed with the Clerk of the Court by using
CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Lisa M. Noltie

An Employee of Lewis Roca Rothgerber Christie